

ARIANE ROWLAND, and JAMIE SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., and WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA

Defendants.

Cause No. CV-20-59-BLG-SPW

**DECLARATION OF
GARY BREAU**

I, GARY BREAU, submit the following declaration on behalf of Defendant Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) in opposition to the Motion to Compel depositions:

1. I am one of Jehovah’s Witnesses and a member of the Worldwide Order of Special Full-Time Servants of Jehovah’s Witnesses (“Order”).

2. I have personal and direct knowledge of the matters set forth.

3. The Order is a group of individuals with no legal form who dedicate their entire lives to supporting the efforts of Jehovah’s Witnesses to spread the gospel about the Christ. All members of the Order operate under a vow of obedience and poverty.

4. As a member of the Order, I serve in the United States as Vice President of Christian Congregation of Jehovah’s Witnesses (“CCJW”). CCJW was incorporated in 2000 and became operational in 2001. CCJW is the corporation used by Jehovah’s Witnesses to communicate with and provide operational support to over 12,000 congregations of Jehovah’s Witnesses nationwide. In addition, it is used in the organization of larger conventions of Jehovah’s Witnesses to contract with arenas, stadiums, and hotels and motels annually. CCJW’s corporative objectives are carried out by over 200 members of the Order on-site in New York and 300 volunteers located throughout the United States, and along with Mr. Allen Shuster (whose deposition was also noticed by plaintiffs), I oversee these individuals. This

is not an exhaustive list of the activities of CCJW, but is designed to provide the Court with insight into my responsibilities.

5. Starting in 1994 when I arrived in New York, I was authorized by the board of directors of WTNY to communicate with congregations regarding spiritual matters using WTNY's letterhead. That role ended in 2001.

6. During that entire time, I was neither a board member nor executive officer of either WTNY or co-defendant Watch Tower Bible and Tract Society of Pennsylvania ("WTPA").

7. During that entire time, I never cared for, corresponded, or communicated with congregations in Montana.

8. As best as I can recollect over my life, I have never met nor do I know the plaintiffs in this lawsuit or any of the accused in this lawsuit.

9. I have never attended religious services at any meeting place of Jehovah's Witnesses in Hardin, Montana.

10. I have briefly reviewed the allegations in the operative Complaint and I have no personal, direct, or indirect knowledge about any of the abuse allegations other than as a result of reviewing that Complaint.

11. While I am acquainted with the beliefs and practices of Jehovah's Witnesses, there are other members of the religious Order with less responsibilities who are as conversant in the handling of child abuse matters.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of October, 2022.



GARY BREAU